COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Owens-Brockway Glass Container Inc.
29 Glass Blower Lane - Ringgold, Pittsylvania County, Virginia
Permit No. SCRO30718

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Owens-Brockway Glass Container Inc has applied for a Title V Operating Permit for its Ringgold facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: August 31, 2006

Air Permit Manager: _____ Date: August 31, 2006

Regional Director: _____ Date: August 31, 2006

FACILITY INFORMATION

Permittee

Owens-Brockway Glass Container Inc.
29 Glass Blower Lane
Ringgold, VA 24586

Facility

Owens-Brockway Glass Container Inc.
29 Glass Blower Lane
Ringgold, VA 24586

County-Plant Identification Number: 51 – 0143 - 0100
UTM Coordinates are ZONE: 17 EASTING: 637.9 km NORTHING: 4045.3 km

SOURCE DESCRIPTION

NAICS Code: 327213 – GLASS CONTAINER MANUFACTURING

Facility Description: SIC Code [3221] – container glass manufacturing - Glass containers are manufactured from recycled glass (postconsumer and inhouse process recycle) and other raw materials. The plant includes the following specific processes: raw material and cullet receiving and storage, raw material blend/mix, glassmelting furnace, glass forming, final bottle treatment and packaging.

Raw Material and Cullet receiving and storage - The facility receives raw materials via truck and rail and stockpiles them in a storage area. The solid raw materials (e.g., sand, salt cake, limestone and soda ash) are conveyed from the truck or rail unloading area to a bucket elevator, which deposits them into silos. A crusher is utilized to size the cullet, then it is screened and the oversize particles are recycled. Postconsumer and inhouse crushed cullet glass pieces to be used in the recycling process is transported by bucket elevators to the silos.

Raw Material Blend/Mix – The solid raw materials for the next batch of glass are transported via conveyors and chutes from the respective silos to the sand scale, major scale and minor scale to be measured. Then the materials are conveyed into the mixer and then on the mixed batch surge hopper. Further transfer is via a vibratory conveyor, mixed batch bucket elevator and a belt conveyor to the batch storage bins, which feed the glass furnace. The silos, scales and conveyors are equipped with dust collectors.

Glass melting furnace – The facility has one furnace (Ref. 1-A) which produce the melt used in the glass forming step. The primary fuel for the furnace is natural gas. The furnace is also fitted with electric boost systems that add to the heat applied to the melt without increasing fuel usage. The furnace is equipped with refiners and forehearths that prepare the glass melt for the forming process. The refiners and forehearths are also fired with natural gas.

Glass Forming – Bottle forming machines shape the glass melt using processes of shearing, gobbing and the final forming. The bottle molds must be continually maintained to produce satisfactory bottles. Preparation of the molds consists of mold repair, cleaning lubricating, curing and heating. Periodic mold swabbing is performed as part of the continuous mold maintenance process. The bottle annealing process is accomplished in a moving bed kiln called a lehr; two each per furnace. The lehrs are fired with natural gas. Molded glass is treated in the

Hot End Surface Treatment (HEST) process where monobutyltin trichloride (MBTT) is applied as a mist. The material forms a coating of tin oxide on the outer surface of the bottles which enhances lubricity during subsequent processing. Further down the line, a Cold End Surface Treatment consists of spraying a dilute solution of polyethylene emulsion on the bottles.

Final Bottle Treatment and Packaging – During the final processing, a bottle coding machine prints the date on the bottles and then they are packaged in cardboard boxes with coded numbers to identify the contents.

Owens-Brockway is a Title V major source of SO_2, NO_x, and PM. The source is located in an attainment area for all pollutants. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year.

The facility currently permitted under a NSR Permit issued on April 6, 2001 for the container glass manufacturing facility and on December 14, 2005 for the glass container hot end surface treatment operation (HEST).

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on September 26, 2005. On March 12, 2006, stack performance tests were conducted for PM (filterable), PM_{10} (filterable and condensible), SO_2, and NOx from the glass melting furnace [Ref. 1-A], to determine compliance with the emission limits contained in Condition IV.A.5 of the Title V permit dated September 5, 2001. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
B-1	001	North American Boiler (1978)	14.6 MMbtu/hr	-	-		4/6/2001
Glass Manufacturing Process							
1-A	003	Furnace A (1978)	99 MMbtu/hr				4/6/2001
13		Silos/Batch House		Fabric Filters	Baghouse-1-16	PM	4/6/2001
6	007	Bottle Finishing (HEST)	6.0 lb_{MBTT}/hr	Aeropulse Baghouse Model P144-8	Baghouse-1	PM	12/14/2005

*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

A copy of the 2005 emission inventory (CEDS) is attached (see Attachment 1). Emissions are summarized in the following tables.

2005 Actual Emissions

	2005 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO_2	PM_{10}	NO_x
Total	0.1	0.8	225.6	37.2	321.1

EMISSION UNIT APPLICABLE REQUIREMENTS

There have been three permits issued for the facility. The first, dated August 26, 1977, was for construction of two glass furnaces; however, only one furnace was built within the allowed construction period. The 1977 permit was superseded by a permit dated April 6, 2001, which incorporates several modifications made to the facility. On December 14, 2005, a permit was issued to modify the hot end surface treatment (HEST), which includes both a throughput limit of monobutyltin trichloride (MBTT) and a limit on potential to emit (PTE). Both the April 6, 2001 and December 14, 2005 permits are valid permits for the plant.

Since issuance of the initial Title V permit on September 5, 2001, the facility has removed the distillate oil burners from the 14.6 MMBtu/hr (heat input) natural gas/distillate oil-fired boiler [Ref. B-1] and the 2.5 MMBtu/hr (heat input) boiler [Ref. B-2], fuel piping, and distillate oil storage tanks (see letter dated July 10, 2006). The facility has added liquefied petroleum gas (LPG) as a supplemental fuel, which has similar combustion characteristics to natural gas. The replacement of distillate oil as a supplemental fuel to the boilers [Ref. B-1, B-2] may be considered as a modification and subject to permitting. The Title V permit renewal replaces distillate oil with LPG as an approved fuel, but does not limit consumption of either natural gas or LPG. Since boiler B-2's capacity is less than 10 MMBtu/hr (heat input) and can only combust gaseous fuels, it is not subject to the provisions of Article 8 of 9 VAC Chapter 40 (Rule 4-8) per 9 VAC 5-40-880.C.3. Therefore, boiler B-2 is an insignificant emission unit per 9 VAC 5-80-720.C. Boiler B-2 has been removed from the list of Significant Emission Units and placed in the list of Insignificant Emission Units.

Fuel Burning Equipment

Limitations

The 14.6 MMBtu/hr natural gas-fired boiler [Ref.B-1] was constructed in 1977, has no add-on controls, and is subject to the applicable Article 8 of 9 VAC Chapter 40 per 9 VAC 5-40-900. Boiler B-1 was constructed prior to June 9,1989, has not been subsequently modified, and is not subject to the provisions of 40 CFR 60 Subpart Dc per 40 CFR 60.40c(a). The Ringgold facility is not a major source of hazardous air pollutants (HAPS) and the boiler [Ref. B-1] is not subject to the existing liquid/gaseous fuel boiler provisions of 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutant (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters per 40 CFR 63.7485.

The Title V permit includes the following:

- Limits the approved fuels to natural gas and LPG;
- Limits PM and SO_2 emissions to 0.5 lb/MMBtu and 2.64 lb/MMBtu, respectively;
- Limits the opacity to less 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity; and
- Requires proper operation of the boiler, written operating procedures, operator training, and records of maintenance and operator training.

The uncontrolled hourly total PM (filterable plus condensible) emissions from the boiler [Ref. B-1] have been calculated using the PM emission factor (SCC #10200602) from AP42, Section 1.4, Natural Gas Combustion, dated 7/98 (see Attachment 2) to be:

$$PM_{total} = \frac{7.6 \text{ lb}/10^6 \text{ ft}^3}{1000 \text{ Btu}/\text{ft}^3 \times 1 \times 10^6 \text{ ft}^3 / 1 \times 10^6 \text{ Btu}} = 0.0076 \text{ lb/MM Btu}$$

The uncontrolled hourly PM emissions from the boiler (Ref. B-1) would be in compliance with the allowable PM emission of 0.5 lb/MMBtu (0.0076 < 0.5) per 9 VAC 5-40-900(A)(1)(b).

The uncontrolled SO_2 emissions from the boiler [Ref. B-1] have been calculated using the SO_2 emission factor (SCC #10200602) from AP42, Section 1.4, Natural Gas Combustion, dated 7/98 (see Attachment 2) to be:

$$SO_2 \text{ (lb/MMBtu)} = \frac{0.6 \text{ lb}/10^6 \text{ ft}^3}{1000 \text{ Btu}/\text{ft}^3 \times 1 \times 10^6 \text{ ft}^3 / 1 \times 10^6 \text{ Btu}} = 0.0006 \text{ lb/MMBtu}$$

The uncontrolled hourly SO_2 emissions from the boiler [Ref. B-1] would be in compliance with the allowable PM emission of 2.64 lb/MMBtu (0.0006 < 2.64) per 9 VAC 5-40-930(A)(1).

Monitoring

Based on the types of fuel (natural gas and LPG) to be combusted in the boiler [Ref. B-1], there is little likelihood of violating the opacity limitation. Therefore, as long as the boiler is operated properly it can be assumed that the opacity limitation will not be violated. Maintenance of operating procedures and performance of maintenance in accordance with the maintenance schedule will ensure compliance with the opacity limitation and satisfy the periodic monitoring requirement for the boiler. Therefore, no periodic monitoring is required for the boiler.

Recordkeeping and Reporting

Boiler B-1 is required to submit an annual emissions update and Title V emissions statement and keep records of the reports. Daily and monthly fuel consumption records are not required. The source is required to maintain records of written operating procedures, operator training, and records of maintenance and operator training.

Testing

Performance testing for PM, SO_2 and opacity for the boiler [Ref. B-1] is not required. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements

None.

PROCESS EQUIPMENT

Batch House Raw and Materials Storage Silos [Ref. 13]

Limitations

The raw materials are unloaded from truck and rail cars and conveyed to enclosed storage silos in the batch plant (house), which was constructed in 1977. The batch house [Ref. 13] has a rated capacity of 34.3 tons/yr of combined raw materials (see Attachment 3). The 16 raw material silo fabric filters vent into the 5th floor of the batch house, which has windows and a roll-up access door, which are normally open during temperate weather.

The Title V permit includes the following:

- Requires that particulate matter (PM, PM-10) emissions from the raw materials storage silos be controlled by fabric filters;
- Requires proper operation of the fabric filters, written operating procedures, operator training, and records of maintenance and operator training; and
- Limits the opacity to less than 20% except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity;

Table 11.15-5 of AP42, Glass Manufacturing, dated 10/86 indicates that the uncontrolled particulate matter emissions from handling raw material in the Batch House are considered to be negligible (see Attachment 3). The Department and source expect less than 10 tons/yr of uncontrolled particulate matter (PM, PM-10) emissions from the 5th floor galley of the Batch House [Ref. 13]. Therefore, Continuous Assurance Monitoring for the Batch House fabric filters is not required per 40 CFR 64(2)(a).

Monitoring

Maintenance of operating procedures and performance of maintenance in accordance with the maintenance schedule will ensure compliance with the opacity limitation and satisfy the periodic monitoring requirement for the fabric filters. As long as the fabric filters are operated properly it can be assumed that the opacity limitation will not be violated. Since the filters exhaust into the 5th floor of the Batch House [Ref. 13], an exceedance of the opacity limit is not expected. Therefore, no periodic monitoring is required for the 16 fabric filters in the Batch House. This decision not to require periodic monitoring for the Batch House is consistent with the August 28, 2005 Title V permit (renewal) for Owens Brockway's Toano Plant (Reg. #60923).

Recordkeeping and Reporting

The permittee is required to submit an annual emissions update and Title V emissions statement and keep records of the reports. Monthly and annual throughput records for the Batch House [Ref. 13] are not required. The source is required to maintain records of written operating procedures, operator training, and records of maintenance and operator training.

Testing

Performance testing for PM and opacity for the Batch Plant fabric filter [Ref. 1-16] is not required. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements

None.

Melt Furnace [Ref. 1-A]

There are two federal regulations which apply to glass manufacturing operations. 40 CFR 61, Subpart N (National Emission Standard for Inorganic Arsenic Emissions from Glass Manufacturing Plants) applies to each glass melting furnace that uses commercial arsenic as a raw material. Because Owens-Brockway uses no commercial arsenic in their manufacturing process, their furnace is not affected by this Subpart. The permit shield includes Subpart N as a requirement which has been explicitly deemed to be not applicable to this facility.

40 CFR 60, Subpart CC (Standards of Performance for Glass Manufacturing Plants) applies to each glass melting furnace that commences construction or modification after June 15, 1979. Owens-Brockway's furnace was built prior to the applicability date but modifications to the furnace have triggered Subpart CC. The furnace meets the 40 CFR 60.291 definition of a unit "with modified processes", and is subject to a particulate matter emission limit of 0.5 g/kg (1.0 lb/ton) in accordance with 40 CFR 60.293. However, this standard is less stringent than the particulate emission limit of 0.71 lb/ton imposed as state BACT in the 4/6/01 permit. The more restrictive particulate emission limit in Condition IV.A.6 ensures compliance with both the streamlined NSPS limit and the underlying minor NSR permit limit.

Limitations

Allowable SO_2 emissions were established based on a mass balance, and previous source-specific emission testing indicates that the unit is capable of operating within the allowable limit. Compliance testing for SO_2 was conducted to substantiate the mass balance calculations; this testing provided a demonstration that the furnace is operating in compliance with the applicable emission standard and that the mass balance calculation can be used as a demonstration of continuing compliance. The melt furnace [Ref. 1-A] does not have add-on controls for SO_2, so CAM for SO_2 does not apply per 40 CFR 64(2)(a).
Allowable NOx emissions were established based an AP-42 emission factor. Compliance

testing for NOx was conducted to substantiate the validity of the emission factor (lb/ton of glass); this testing provided a demonstration that the furnace is operating in compliance with the applicable emission standard and that the mass balance calculation can be used as a demonstration of continuing compliance. The melt furnace [Ref. 1-A] does not have add-on controls for NOx, so CAM for NOx does not apply per 40 CFR 64(2)(a).

Allowable particulate matter (PM-filterable, PM-10-including condensible) emissions were established based on an allowable emission rate of 0.5 g/kg (1.0 lb/ton) in accordance with 40 CFR 60.292 and an actual emission rate of 0.71 lb/ton as demonstrated in the stack test report dated December 1, 1995 (also BACT); this testing provided a demonstration that the furnace is operating in compliance with the applicable emission standard and that the mass balance calculation can be used as a demonstration of continuing compliance. The melt furnace [Ref. 1-A] does not have add-on controls for particulate matter emissions, so CAM for particulate matter emissions does not apply per 40 CFR 64(2)(a).

The Title V permit includes the following:

- Limits the approved fuel for the glass furnace to natural gas;
- Limits the sulfur content of the raw materials fed to the glass furnace to 0.25% by weight (5.0 lb total S as SO_3 per ton of raw material charged to the furnace
- Limits the production of pulled glass to 146,000 tons per year (which is equal to average daily production of 400 tons)
- Limits the hourly and annual PM, PM-10, SO_2, NOx, VOC, and CO emissions from the glass furnace;
- Limits the opacity to either 11.22% (see Attachment 4); or the redetermined opacity value that corresponds to the 99% upper confidence level in accordance with 40 CFR 60.293(e), but shall not to exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity;
- A continuous opacity monitor system (COMS) is required for the melt furnace; and
- The melt furnace is subject to the provisions of NSPS Subpart CC.

Monitoring

In accordance with NSPS Subpart CC, periodic monitoring requirements for opacity from the melt furnace [Ref. 1-A] are based on continuous opacity monitoring. A stack test for particulate emissions had been run concurrently with the performance evaluation for the COMS. During the test, the opacity value corresponding to the 99% upper confidence level of a normal distribution of average opacity values was established. The opacity limit is the lower of this value or 20% opacity as allowed under state regulation. As required by Subpart CC, 6-minute periods when opacity exceeds the 99% UCL are to be reported as excess emissions. Additional periodic monitoring for the melt furnace [Ref. 1-A] is not required.

Recordkeeping and Reporting

The permittee is required to submit an annual emissions update and Title V emissions statement and keep records of the reports. Monthly and annual throughput records for the glass production, raw material sulfur content, are required. The source is required to have written operating procedures, and maintain records of operator training and maintenance.

Testing

Performance testing for PM, SO_2 and NOx from the melt furnace [Ref. 1-A] will be repeated once each permit term, at a frequency not to exceed five years.

Streamlined Requirements

The NSPS Subpart CC particulate matter emission limit of 0.5 g/kg (1.0 lb/ton) in accordance with 40 CFR 60.293 is less stringent than the particulate emission limit of 0.71 lb/ton of the 4/6/01 permit. The more restrictive particulate emission limit in Condition IV.A.6 ensures compliance with both the streamlined NSPS limit and the underlying minor NSR permit limit. Therefore, the NSPS Subpart CC particulate matter emission limit has been streamlined out of the Title V permit.

Hot End Surface Treatment (HEST) [Ref. 6]

Limitations

The HEST process was determined to be a modification to the glass container manufacturing facility that was permitted on December 14, 2005.

The Title V permit includes the following:

- Limits the consumption of MBTT to 3796.5 gallons per year;
- Limits hourly and annual VOC emissions;
- Requires that proper operation of the HEST process, written operating procedures, operator training, and records of maintenance and operator training;
- Limits the opacity to less 10 percent opacity; and
- Requires monthly and annual records of MBTT consumption.

The HEST process [Ref. 6] does not have add-on controls for VOC emissions and the uncontrolled 8,760 hr/yr VOC emissions are less than or equal to 17.5 tons/yr, so CAM for VOC emissions does not apply per 40 CFR 64(2)(a).

Monitoring

Periodic monitoring is required for the HEST process to demonstrate compliance to the opacity limit.

Recordkeeping and Reporting

The permittee is required to submit an annual emissions update and Title V emissions statement and keep records of the reports. The source is required to maintain records of monthly and annual consumption of MBTT, written operating procedures, and records of maintenance and operator training for the HEST process [Ref. 6].

Testing

Performance testing for VOC emissions and opacity for the HEST process [Ref. 6] is not required. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements

None.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Permit Expiration
This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia,* and the "Department of Environmental Quality Agency Policy Statement NO. 3-2001". This general condition cite(s) the Article(s) that follow(s):

Article 1 (9 VAC 5-80-50 et seq.) and Part II of 9 VAC 5 Chapter 80 Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:
9 VAC 5-80-80 Application
9 VAC 5-80-140 Permit Shield
9 VAC 5-80-150 Action on Permit Applications

Failure/Malfunction Reporting
Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction. This general condition cites the sections that 9 VAC 5-50-50, Notification, Records and Reporting apply to this facility.

Permit Modification
This general condition cites the sections that follow:
9 VAC 5-80-50 Applicability, Federal Operating Permit for Stationary Sources
9 VAC 5-80-190 Changes to Permits.

9 VAC 5-80-260 Enforcement.
9 VAC 5-80-1100 Applicability, Permits for New and Modified Stationary Sources

Malfunction as an Affirmative Defense
The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180 Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110 Permit Content

Asbestos Requirements
The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70 Designated Emissions Standards
9 VAC 5-80-110 Permit Content

FUTURE APPLICABLE REQUIREMENTS
None has been specifically identified.

INAPPLICABLE REQUIREMENTS
As previously discussed, CAM does not apply to the glass container manufacturing plant's fuel burning or processes emission units per 40 CFR 64(2)(a). The 14.6 MMBtu/hr gas/LPG-fired boiler [Ref. B-1] is not subject to the provisions of National Emission Standards for Hazardous Air Pollutants From for Industrial, Commercial, and Institutional Boilers and Process Heaters and 40 CFR 63 Subpart DDDDD per 40 CFR 63.7490 and 40 CFR 63.7575. The glass process does not use commercial arsenic, so 40 CFR 61 Subpart N does not apply to the melt furnace.

COMPLIANCE PLAN
Not required.

INSIGNIFICANT EMISSION UNITS
The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)

B-2	North American gas-fired boiler (1978)	9 VAC 5-80-720 C		2.4 MMBtu/hr
2-A	Refiner	9 VAC 5-80-720 C		9.3 MMBtu/hr
3-A	Forehearths (2)	9 VAC 5-80-720 C		0.7 MMBtu/hr, each
4	Annealing Lehrs	9 VAC 5-80-720 C		4.8 MMBtu/hr, max.
5	Bottle Forming (mold dope)	9 VAC 5-80-720 B	PM	
7	Bottle Finishing (polyethylene emulsion)	9 VAC 5-80-720 B	PM	
8	Bottle Coding	9 VAC 5-80-720 B	VOC, HAP (MEK)	
9	Box Coding	9 VAC 5-80-720 B	VOC	
10	Ink Cleaner	9 VAC 5-80-720 B	VOC, HAP (MEK)	
12	Glass Crushers (2)	9 VAC 5-80-720 B	PM	
14	Parts Washer Stations	9 VAC 5-80-720 B	VOC	
16	API Separator	9 VAC 5-80-720 B	VOC, HAP (naphthalene)	
17	Storage Tanks	9 VAC 5-80-720 B	VOC, HAP (benzene, toluene, ethyl benzene, xylene, naphthalene)	
SFL-1	Solid Film Lubricant	9 VAC 5-80-720 B	PM, VOC, HAP (xylene)	
M-1, M-2	Mold Heat Ovens	9 VAC 5-80-720 C		0.4 MMBtu/hr, each
18	Diesel Generator (<500 hours/yr)	9 VAC 5-80-720 C		<600 hp

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION
None.

PUBLIC PARTICIPATION
The proposed permit will be placed on public notice in the **DANVILLE REGISTER** from July 20, 2006 to August 20, 2006.